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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EPIDEMIC SOUND, AB,

Plaintiff,

vs.

META PLATFORMS, INC., f/k/a FACEBOOK,
INC.,

Defendant.

CASE NO. 3:22-cv-04223-JSC

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
PRODUCE LICENSING AGREEMENTS**

The Honorable Jacqueline Scott Corley

1 Pursuant to Civil Local Rules 6-1(b) and 6-2, IT IS HEREBY STIPULATED AND
2 AGREED, by and among Plaintiff Epidemic Sound, AB (“Plaintiff”) and Defendant Meta
3 Platforms, Inc. f/k/a Facebook, Inc. (“Defendant”), by and through their respective counsel of
4 Record (together, the “Parties”), as follows:

5 1. WHEREAS, on June 5, 2024, the Court held a case management conference during
6 which the Parties met and conferred regarding and the Court heard certain discovery disputes (Dkt.
7 No. 154);

8 2. WHEREAS, during that conference and hearing, the Court ordered Defendant to
9 produce its licensing agreements with Sony Music Entertainment and Sony Music Publishing
10 (“Sony”), Warner Music Group and Warner Chappell Music (“Warner”), Universal Music Group
11 and Universal Music Publishing Group (“UMG”), BMG Rights Management (US) LLC (“BMG”),
12 and Kobalt Music Group (“Kobalt”) within thirty days of that conference (Dkt. No. 156 at 8:18–
13 24);

14 3. WHEREAS, Sony, Warner, and UMG have requested additional time to consider
15 whether to seek relief from the Court’s order compelling Defendant’s production of their license
16 agreements, and thereby are requesting the Parties stipulate to extending the deadline by which
17 Defendant must produce its licensing agreements with them;

18 4. WHEREAS, the Parties have agreed to stipulate to the requested extension such
19 that Defendant has until August 30, 2024 to produce its agreements with Sony, Warner, UMG,
20 BMG, and Kobalt, respectively, and Sony, Warner, UMG, BMG, and Kobalt shall be entitled,
21 prior to production, to object to or seek to condition production of their license agreements with
22 Defendant;

23 5. WHEREAS, Meta will not produce the ordered license agreements until the earlier
24 of it receiving authorization to do so from the respective music partner or the stipulated deadline
25 of August 30, 2024;

26 6. WHEREAS, pursuant to Civil L.R. 6-2(a)(2), there have been six other time
27 modifications in this case: (1) an extension of time for Defendant to respond to the Complaint
28 (Dkt. No. 27), (2) an extension to the Parties’ briefing schedule on Defendant’s motion to dismiss

(Dkt. No. 34), (3) a 60-day continuance of the fact discovery cut-off (Dkt. No. 101 at 3), (4) an order temporarily vacating upcoming deadlines until the Court enters an amended case schedule (Dkt. No. 117), (5) an extension of time for Plaintiff to file its reply in support of its motion to strike (Dkt. No. 132), and (6) an order resetting the case schedule (Dkt. No. 151);

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the Parties, through their respective undersigned counsel of record, and subject to the approval of the Court, that the deadline by which Defendant must produce its licensing agreements with Sony, Warner, UMG, BMG, and Kobalt shall be extended to August 30, 2024, and any objection by Sony, Warner, UMG, BMG, and Kobalt to such production must be filed before August 30, 2024.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: July 2, 2024

PRYOR CASHMAN LLP

/s/ M. Mona Simonian

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Attorneys for Plaintiff Epidemic Sound, AB

Dated: July 2, 2024

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Inc.*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2024

HON. JACQUELINE SCOTT CORLEY
U.S. District Court Judge

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 2, 2024

/s/ Brittany N. Lovejoy
Brittany N. Lovejoy
LATHAM & WATKINS LLP
Attorney for Defendant Meta Platforms, Inc.